

## Ronald I. LeVine

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April 12, 2012

Clerk of the Bankruptcy Court

Re: James Georginis, Debtor  
Chapter 11 Case No.: 11-19694DHS  
Letter of Modification/Correction to Chapter 11 Plan and Disclosure Statement

Dear Sir or Madam:

This letter will serve to confirm that the following correction and modification should be made to the Chapter 11 Plan and Disclosure Statement dated February 9, 2012 and efiled on the same day:

1. The treatment of Wayne Thomas appearing in the Plan under Class 2 shall be changed from the present cramdown and bifurcation of claim into secured and unsecured portions, to a surrender of the property to Wayne Thomas through a Deed-in-lieu of foreclosure. The Deed-in-lieu will be in exchange for the value of the property as scheduled in the petition and therefore not affect the creditor's claim amount under Class 4 for the unsecured portion of his first mortgage on the Scranton property.
2. Class 5 shall be deleted inasmuch as Wayne Thomas shall accept the Scranton, PA property subject to the tax lien of the Lackawanna County Tax Collector and presumptively will satisfy same after accepting a deed-in-lieu of this property.
3. The Disclosure Statement should also be corrected in the same way in Section III. C. 1 to reflect the above changes to Class 2 and 5 as indicated above.
4. Reference on page 11 of the Disclosure statement in "Other Legal Proceedings" referring to the State Court action under DC#3094-11 shall also include the following: Said lawsuit includes Wayne Thomas as a named Defendant, and Debtor has agreed to release Mr. Thomas from that suit upon the confirmation of this Plan. Said release shall not prevent Defendant from pursuing a post petition counterclaim contained in DC#3094-11, or debtor defenses thereto.

April 23, 2012  
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These corrections/modifications are non-material to all parties in this case aside from the debtor and Mr. Thomas, and for that reason it is respectfully requested that this "Letter of Modification/Correction" be accepted as modifying the Plan and Disclosure Statement without the need for filing a new amended Plan and Disclosure Statement.

Very truly yours,

RW:

/s/ Robert Wachtel  
/s/ Robert Wachtel